## UNITED STATES BANKRUPTCY COURT **EASTERN DISTRICT OF VIRGINIA** RICHMOND DIVISION

In re:	
Thomas Alan Minor and Renee Scott Minor	) Case Number 10-30161-KLP ) Chapter 7 ) Adversary and Counterclaim
Thomas A.Minor	) Adversary Proceeding ) Number 13-03152-KLP
Plaintiff	<ul><li>) Chief United States Bankruptcy</li><li>) Judge Keith L. Phillips</li><li>) Eastern District of Virginia</li></ul>
V.	)
Eloise K. Hahn	)
Defendant	) }
Eloise K. Hahn, dba Managing Member of Burke Financial LLC Member of Win Par Hospitality Laredo LLC  Counter Claimant Plaintiff/ Counter Appellant	RICHMOND DI  F  APR 2.8  E  D  CLERK U.S. BANKRUPIC
vs	) )
Thomas A. Minor, dba President of Diversified Commercial Mortgage Member of Win Par Hospitality Laredo LLC (undisclosed on chapter 7 January 10, 2010 petition)	) ) ) ) )
Renee Scott Minor	) )
Counter Claimant Defendants/ Appellee	, ) )

RICHMOND DIVISION APR 2 8 2015 LE CLERK

PETITIONER'S MOTION TO STAY APPEAL CONTINGENT ON RECEIPT OF FINANCIAL DOCUMENTATION

## REQUESTED OR IN THE ALTERNATIVE MOTION FOR CHANGE OF VENUE TO THE NORTHERN DISTRICT OF ILLINOIS FEDERAL DISTRICT COURT

COMES NOW Petitioner, Eloise K. Hahn, appeallant and for her cause of action alleges and says:

- 1. That she is the apeallant in this cause of action.
- 2. That she is no longer interested in litigating this matter provided appeallant party, Thomas A. Minor, provide her financial documentation wrt the foreclosure of the three Laredo lots, namely lots 11, 12, and 13, the bills of sale for the three hotels built and constructed during the years of 2006

through 2011, the hotel revenue collected, and any and all loan documentation and financial statements presented to the banks on behalf of Parsons and himself.

3. That opposing counsel provide her the information within the next thirty days in order that appellant be able to complete her tax returns for the years 2006 through 2014, including Burke's members.

Wherefore, the Petitioner (appeallant) hereby moves this honorable court to stay this matter until June 10, 2015, in order that appeallee party, Thomas A. Minor, comply with this request

so that appeallant be able to complete her tax returns for the years 2006 through 2014. By June 10,2014, appeallant will notify the respective courts whether she has received the requested information and if any further information is warranted.

A final plan of action will be determined at that time, if any.

Respectfully submitted,

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Eloise K. Hahn Managing Member of Burke Financial Former Member of Win Par Hospitality PO Box 662 Chesterton, IN 46304

## CERTIFICATE OF SERVICE

I, Eloise k. Hahn, do hereby certify that I forwarded a copy of the foregoing motion to the following parties via USPS first class mail being:

Jason Krumbein Attorney for the Debtor(s) Krumbein Consumer Legal Services 5310 Market Road, Suite 102 Richmond, VA 23230

US Bankruptcy Court Clerk of the Court Attn: Coindy Baumgartner, Deputy Clerk 701 E. Broad St. Suite 4000 Richmond, VA 23218

U.S. Trustee Attn: Shannon Percoraro 701 E. Broad St. Suite 4304 Richmond, VA 23219

Law Office of Hank Marino Attn: Hank Marino, Esquire 53 W. Jackson Blvd. Room 1552 Chicago, IL 60604

Law Office of Kevin Willis Attn: Kevin Willis, Esquire 2137 S. Euclid Av, Ste 3 Berwyn, IL 60402

US Federal District Court Richmond Division Richmond, VA (to be forwarded by Cindy Baumgartner)

April 23, 2015

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